

No. PD-0563-17  
COURT OF APPEALS CAUSE NO. 03-15-00332-CR

FILED  
COURT OF CRIMINAL APPEALS  
11/7/2017  
DEANA WILLIAMSON, CLERK

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TO THE COURT OF CRIMINAL APPEALS  
OF THE STATE OF TEXAS

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TERRI REGINA LANG

Appellant

v.

STATE OF TEXAS

Appellee

Appeal from Burnet County

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APPELLANT'S FIRST MOTION TO EXTEND  
TIME TO FILE APPELLANT'S BRIEF

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ATTORNEY FOR APPELLANT

TO THE HONORABLE COURT OF APPEALS:

COMES NOW, Appellant, TERRI REGINA LANG, who files this First Motion for Extension of Time to File Brief and shows unto the Court as follows:

I.

Appellant's Brief is due on or before November 3, 2017.

II.

Appellant is asking for an additional thirty days to file his brief, which should make his brief due on or before December 4, 2017 (actual deadline falls on Sunday, December 3, 2017).

III.

Facts relied on to reasonably explain the need for an extension include the following:

1. Study for Board Certification Exam in Criminal Appellate Law, and take exam on October 16, 2017 (studying variously as time permitted).
2. Draft brief and send paper copies required by rule, draft first motion for extension of time, correspondence to client; draft and submit brief in *Smith v. State*; PD-0514-17; Court of

Criminal Appeals. (Brief due originally on September 22, 2017; Court grants 15 day extension only; brief due on October 9, 2017, but submitted on October 2, 2017) (Work performed on September 22, 2017; September 28, 2017; September 29, 2017; October 2, 2017; October 4, 2017).

3. Review record, request extension of time, and draft brief in *Goodin v. State*, Cause No. 11-17-00073-CR. (Work performed on September 7, 2017; September 11, 2017; September 12, 2017; September 13, 2017; September 19, 2017; September 20, 2017; September 27, 2017; October 3, 2017; October 4, 2017; October 5, 2017; October 6, 2017; October 9, 2017).
4. Review parts of record, respond to client letter, and draft and submit second motion for extension of time to file brief, in *McBride v. State*, 03-17-00271-CR. (Work performed on September 25, 2017; September 26, 2017; October 9, 2017; October 17, 2017; October 19, 2017; October 20, 2017; October 23, 2017; October 27, 2017).

5. Review record, review and respond to client letter, draft first motion for extension of time to file brief, perform legal research, draft and submit brief for filing, send brief to client with detailed letter in *Harris v. State*; 07-17-00292-CR. (Work performed on September 25, 2017; October 2, 2017; October 17, 2017; October 18, 2017; October 19, 2017; October 23, 2017; October 24, 2017; October 27, 2017; October 30, 2017; October 31, 2017; November 1, 2017; November 2, 2017).
6. Draft and submit second motion for extension of time to file brief, review parts of record, perform legal research, and begin drafting brief in *In the Matter of D.L.*, 03-17-00491-CV (Work performed on October 5, 2017; October 20, 2017; November 1, 2017; November 2, 2017).
7. Detailed letter to client enclosing and explaining brief, discussing habeas, etc. *Kelley v. State*; Cause No. 10-17-00169-CR. (Work performed on October 4, 2017).
8. Draft and submit first motions for extension of time to file briefs in *Summers v. State*; 10-17-00150-CR and 10-17-00151-CR. (Work performed on October 18, 2017).

9. Review opinion and judgment of Court of Appeals, and send to client in compliance with Rule 48.4, in detailed letter, in *Diaz v. State*, 10-16-00218-CR. (Work performed on October 5, 2017; October 9, 2017).
10. Work related to dependent administration (e.g., work related to hiring CPA for unpaid income tax issue; client telephone conference) in *In the Estate of Charping, Deceased*; Cause No. 32,155; County Court at Law No. 1, Bell County. (Work performed on October 5, 2017; October 18, 2017; November 1, 2017).
11. Draft agreed motion to withdraw and letter to client, review and respond to client letter, revise and send agreed motion to withdraw to client in *Ex parte Marsh*; Cause No. CCCR-11-03262-B; Comanche County, Texas. (Work performed on October 10, 2017; October 13, 2017; October 23, 2017).
12. Draft and submit Original Petition, along with prepared exhibits, for filing in *Suresh v. Mitchell, et al*; Cause No. 17-JSC41-01234; Justice of the Peace Precinct 4—Fort Bend

County, Texas. (Work performed on October 12, 2017; October 13, 2017).

13. Draft and submit Motion for Default Judgment in *Rudy's Repair and Remodel, LLC v. Coleman*; Cause No. 422017S0039544; Justice of the Peace Precinct 4, Place 2; Bell County, Texas. (Work performed on October 6, 2017; October 18, 2017).
14. Attend hearing as attorney ad litem in *In the Estate of Ronald Wayne Thompson, Deceased*, Cause No. 32,380, Bell County Court at Law No. 1. (Work performed on October 30, 2017).
15. Tax foreclosure hearing as attorney ad litem on October 19, 2017 in the 169<sup>th</sup> District Court of Bell County, Texas, and preparatory work. (Work performed on October 12, 2017 and October 19, 2017).
16. Miscellaneous work/work-related activity (e.g., , drafting and reviewing documents, demand letters etc.) (performed variously over the course of the last month).

#### IV.

No previous extension has been requested and granted in this matter.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Appellant asks this Court to extend his time for filing his brief to thirty (30) days from the date his brief is due.

Respectfully submitted:

/s/ Justin Bradford Smith

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ATTORNEY FOR APPELLANT

CERTIFICATE OF SERVICE

I hereby certify that on November 3, 2017, a true and correct copy of Appellant's First Motion for Extension of Time to File Brief is being forwarded to the counsel below by email and/or eservice:

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